

1 JASON M. FRIERSON
2 United States Attorney
3 Nevada Bar No. 7709
4 STEVEN J. ROSE
5 Assistant United States Attorney
6 Nevada Bar No. 13575
Steven.Rose@usdoj.gov
501 Las Vegas Boulevard South, Suite 1100
6 Las Vegas, Nevada 89101
PHONE: (702) 388-6336
Attorneys for the United States of America

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ROBERT BUCKHANNON,

13 Defendant.

Case No.: 2:14-cr-00315-JCM-VCF

**STIPULATION TO EXTEND
RESPONSE DEADLINE TO
DEFENDANT'S MOTION FOR
EARLY TERMINATION OF
SUPERVISED RELEASE [ECF No.
141]**

(First Request)

14
15 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
16 Frierson, United States Attorney, and Steven Rose, Assistant United States Attorneys,
17 Counsel for the United States of America; and Gia Marina, Counsel for Robert
18 Buckhannon, that the Government's deadline to respond to Defendant's Motion for Early
19 Termination of Supervised Release [ECF No. 141], currently set for June 23, 2023, be
20 vacated and continued to July 7, 2023.

21 This Stipulation is entered into for the following reasons:

22 1. Defendant Robert Buckhannon is currently on supervision through the
23 United States Probation Office in two cases: 2:22-cr-00040-JCM-EJY, and the instant case:
24 2:14-cr-00315-JCM-VCF.

1 2. Previously, Defendant was sentenced to three years probation. Judgment,
2 *United States v. Buckhannon*, No. 2:14-cr-00315-JCM-VCF (D. Nev. June 7, 2018) [ECF No.
3 112]. Separately, Defendant was sentenced to 24 months in prison, followed by a 3 year
4 term of supervised release. Judgment, *United States v. Buckhannon*, No. 1:18-cr-00169-JTN-1
5 (S.D. Mich. Feb. 13, 2020) [ECF. No. 86]. In 2022, Defendant's term of supervised release
6 was transferred to Nevada. Order Accepting Jurisdiction Transfer of Probation/Supervised
7 Release, *United States v. Buckhannon*, No. 2:22-cr-00040-JCM-EJY (D. Nev. Feb. 25, 2023)
8 [ECF Nos. 2, 5].

9 3. On June 9, 2023, Defendant filed motions seeking early termination of
10 probation/supervised release in each case. Motion, No. 2:14-cr-00315-JCM-VCF (D. Nev.
11 June 9, 2023) [ECF No. 141]; Motion, No. 2:22-cr-00040-JCM-EJY (D. Nev. June 9, 2023)
12 [ECF No. 7].

13 4. Counsel for the government has had communications with the United States
14 Probation Office regarding Defendant's projected expiration date or dates for his terms of
15 probation and supervised release. The communication received from the Probation Office is
16 different from the projected date contained in Defendant's motions.

17 5. Counsel for the government and Counsel for Defendant anticipate discussing
18 Defendant's motions and the position the government intends to take, and those discussions
19 may not be completed before the June 23, 2023 deadline for the government's response.

20 //

21 //

22 //

23 //

24 //

6. Defendant Buckhannon is not in custody and does not object to the continuance.

Respectfully submitted this 22nd day of June, 2023.

JASON M. FRIERSON
United States Attorney
District of Nevada

/s/ Gia Marina
GIA MARINA
Attorney for Defendant

/s/ Steven J. Rose
Assistant United States Attorney
Attorney for Plaintiff

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

Case No.: 2:14-cr-00315-JCM-VCF

4 Plaintiff,

ORDER

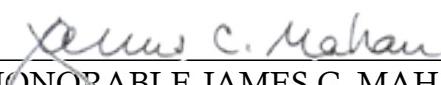
5 v.

6 ROBERT BUCKHANNON,

7 Defendant.

8
9 IT IS THEREFORE ORDERED that the Government's deadline to respond to
10 Defendant's Motion to for Early Termination of Supervised Release, currently set for
11 June 23, 2023, is vacated and continued to July 7, 2023.

12 DATED June 23, 2023.

13 
14 _____
15 HONORABLE JAMES C. MAHAN
16 UNITED STATES DISTRICT JUDGE